

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:23CV224
Plaintiff,	:	
	:	
v.	:	
	:	
17221 COVES EDGE LANE, CHARLOTTE,	:	
MECKLENBURG COUNTY, NORTH	:	
CAROLINA, WITH ALL APPURTENANCES	:	
AND IMPROVEMENTS THEREON,	:	
	:	
and	:	
	:	
4016 WILD NURSERY COURT, CHARLOTTE,	:	
MECKLENBURG COUNTY, NORTH	:	
CAROLINA, WITH ALL APPURTENANCES	:	
AND IMPROVEMENTS THEREON,	:	
Defendants.	:	

VERIFIED COMPLAINT OF FORFEITURE

NOW COMES Plaintiff, United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action in rem brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(A) and (C) for the forfeiture of the aforesaid defendant real properties which constitute or were derived from proceeds traceable to an offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), or a conspiracy to commit such offense, specifically a violation of 18 U.S.C. § 1343 (wire fraud), and/or 18 U.S.C. § 1347 (health care fraud).

2. The defendant properties are as follows:

a. 17221 Coves Edge Lane – All that certain lot or parcel of land known as 17221 Coves Edge Lane, Charlotte, Mecklenburg County, North Carolina, with all appurtenances and improvements thereon, more particularly described as follows:

BEING known and designated as all of Lot 227 of Regency at the Palisades, Palisades Tract 2, Phase 2, Map 3, as shown on map thereof recorded in the Mecklenburg County Public Registry in Map Book 61, Page 227, reference to which is hereby made for a more particular description.

(See Exhibit A-1 attached hereto). The record title holder of the subject real property is Kris Williams-Falcon. The property was acquired on or about May 13, 2022, by North Carolina General Warranty Deed recorded in the Mecklenburg County Register of Deeds at Book 37341, Pages 337-338, on May 16, 2022.

b. 4016 Wild Nursery Court – All that certain lot or parcel of land known as 4016 Wild Nursery Court, Charlotte, Mecklenburg County, North Carolina, with all appurtenances and improvements thereon, more particularly described as follows:

BEING all of Lot 4 of PRESTON FOREST SUBDIVISION, Phase II, Map 1 as same is shown on a map thereof recorded in Map Book 29 at Page 59 in the Mecklenburg County Public Registry.

(See Exhibit A-2 attached hereto). The record title holder of the subject real property is Kris Falcon, a.k.a. Kris Williams Falcon. The property was acquired on or about October 19, 2022, by North Carolina General Warranty Deed recorded in the Mecklenburg County Register of Deeds at Book 3733, Pages 668-669, on October 25, 2022.

3. Plaintiff brings this action in rem in its own right to forfeit and condemn the defendant real properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. §

1355(a).

4. This Court has venue pursuant to 28 U.S.C. § 1355(b)(1) and 1395.

5. The defendant real properties have not been seized and are not located in this district, but one or more of the acts giving rise to forfeiture occurred in this district. The United States of America does not request authority from the Court to seize the defendant properties at this time. The United States will, as provided by 18 U.S.C. § 985(b) and (c)(1):

- a. post notice of this action and a copy of the Complaint on the defendant real properties;
- b. serve notice of this action on the defendant real properties' owners and any other person or entity who may claim interest in the defendant real properties; and
- c. file Lis Pendens in the county records of the property statuses as defendants in this action.

6. The facts and circumstances supporting the forfeiture of the defendant real properties are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that judgment be entered declaring the defendant properties be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 14th day of March, 2023.

Respectfully submitted,

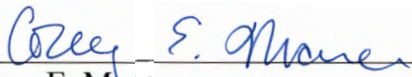
SANDRA J. HAIRSTON
UNITED STATES ATTORNEY

/s/ Lynne P. Klauer

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VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information and belief.



Corey E. Maser
Special Agent
Federal Bureau of Investigation